

EXHIBIT 1



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December 5, 2022

William Droze
TROUTMAN PEPPER HAMILTON SANDERS LLP
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RE: *Earl Parris, Jr., Individually, and on behalf of a Class of Persons
Similarly Situated v. 3M Company, et al.*
In the United States District Court for the Northern District of Georgia,
Rome Division
Case Number: 4:21-cv-00040-TWT
Our File Number: 1403-9155

Dear Mr. Droze:

Following up on the depositions of the corporate representatives of Mount Vernon Mills, Inc., taken on November 17, 2022, at your office, we direct your attention to the following documents discussed by the witnesses which were not produced and which we believe are material, relevant and subject to discovery in this case:

1. The Mount Vernon Mills Sustainability/Environmental Policy.
(Williams at p. 36)
2. The contract or agreement between Mount Vernon Mills, Inc.,
and the City of Trion for providing water from Mount Vernon
Mills' Spring. (Williams at pp. 115-117)
3. Payments made by the City of Trion to Mount Vernon Mills, Inc.,
for water. (Williams at p. 117)

4. “Formal correspondence” between Mount Vernon Mills and the City of Trion, and particularly the Environmental Affairs Office of Mount Vernon Mills regarding any contracts or agreements for the handling of Mount Vernon Mills’ wastewater, sludge or other waste products from Mount Vernon Mills’ manufacturing processes.
5. “Sludge management” plans. (Williams at p. 119)
6. Any predecessor “record retention” policies. (Williams at pp. 16-17)
7. The litigation hold letter issued in this case. (Williams at p. 19)
8. “Formal correspondence” between Mount Vernon Mills, Inc., and the City of Trion and/or the Georgia Environmental Protection Department (“EPD”) concerning PFAS, perfluorochemicals and/or PFCs in Mount Vernon Mills’, whether sent or received by e-mail or mail.
9. A copy of Mount Vernon Mills’ Corporate Ethics and/or Corporate Conduct Code. (Williams at pp. 37-38)
12. Lawsuits against chemical manufacturers in the possession of Mount Vernon Mills, along with accompanying e-mails in the possession of Mr. Williams or Mr. Beagle. (Williams at pp. 45-46)
13. Any and all text messages concerning PFAS containing products and the contamination of the City of Summerville water supply sent from or received by management employees with corporate mobile phones, including, but not limited to, Ron Beagle, Gary Williams and Edward G. Cochrane or Ned Cochrane.

In addition, as we previously discussed as a way to resolve the dispute over the 2016 time limitation objection interposed by Mount Vernon Mills to most of the Plaintiff’s document requests, based on the deposition testimony and documents reviewed, we suggest the following custodians and search terms for both electronic and paper documents as a means of reducing the burden on defendant. The documents should

be produced back to 1992, the year that biosolids disposal began in the Raccoon Creek watershed.

Custodians:

Ron Beegle
Bill Sabo
Jerry Rivers
Ronnie Gribble
Jerry Rivers
Andy Oberg
Billy Havird
David Tuggle
John Sarrett
Wally Todd
Frank Clements
Edward G. Cochrane or "Ned" Cochrane
Roger Chastain
Jerome Womack

Search Terms:

Suppliers

Bill Blount (Pulcra)
Pat Eberline (Pulcra)
Carey Griffin (Pulcra)
Frank Adamsky (Daikin)
Thomas Poston (Daikin)
Haley Eiland (Daikin)
Bill Weppner (3M)
Mike Zavaglia (Mount Vernon Chemicals)
Steve McAlister (3M)
Peter Thomas (Huntsman)

Other Terms

Purchase History Analysis Report
Product Group Usage Report

Dye and Chemical Consumption
Finish Recipes
Purchasing Documents or Purchase Orders
3M
DuPont
Chemours
Daikin
Huntsman
Ciba
Pulcra
Appollo
Mount Vernon Chemicals
Apexical
Piedmont
Sequa
Omnova
Scotchgard
FC-248
Zonyl
LX Platform
Capstone
Phobol
Oleophobol
Asahi
Archroma
Fluorochemicals
Fluoropolymer
Methacrylate
Urethane
Telomer
Dual action repel release
Dual action finish
Long-chain
Short-chain
C6
C8
Per and-Polyfluoroalkyl Substances or PFAS
Perfluorooctanesulfonic acid (PFOS)
Perfluorooctane sulfonamide (FOSA)

N-methyl perfluorooctane sulfonamide (MeFOSA)
Perfluorooctanoic acid (PFOA)
Perfluorohexanoic acid (PFHxA)
Material Safety Data Sheet or MSDS
Safety Data Sheet or SDS
Product Toxicity
Product Environmental
Industrial Hygiene
Wastewater
Waste disposal
Disposal Methods
Industrial User
WWTP
Chemicals Used
Licensing Agreement
Brand assurance

If there are any questions about these refinements to the document requests, please contact us. If we are unable to resolve the objections to production of these documents, we intend to file a motion to compel with the Court.

Sincerely,



Gary A. Davis
Davis Attorneys, P.C.



Jeff Friedman
Friedman, Dazzio & Zulanas, P.C.

cc:

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